

JASON M. FRIERSON
 United States Attorney
 Nevada Bar No. 7709
 MICHAEL J. MULLEN
 Special Assistant United States Attorney
 Washington Bar No. 54288
 Office of the General Counsel
 Social Security Administration
 6401 Security Boulevard
 Baltimore, MD 21235
 Telephone: (206) 615-2748
 Facsimile: (206) 615-2531
 E-Mail: michael.j.mullen@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHELLE THOMAS,

Plaintiff,

v.

KILOLO KIJAKAZI,
 Acting Commissioner of Social Security,

Defendant.

Case No.: 3:23-cv-00072-CLB

**ORDER GRANTING
 UNOPPOSED MOTION FOR
 EXTENSION OF TIME
 (FIRST REQUEST)**

Defendant, the Commissioner of Social Security, respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 19, filed on July 19, 2023), currently due on August 18, 2023, by 35 days, through and including September 22, 2023. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload, as described below. In the span of four workdays, Defendant's counsel has six briefing deadlines, including this matter. In August 2023, counsel has

1 completed numerous other briefing assignments. Although counsel has exercised due diligence, the
2 requested additional time is necessary.

3 Additional time is required to review the record, to evaluate the issues raised in Plaintiff's
4 motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response
5 to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible.
6 This request is made in good faith and with no intention to unduly delay the proceedings, and counsel
7 apologizes for any inconvenience.

8 On August 17, 2023, counsel for Defendant conferred with Plaintiff's counsel, who has no
9 opposition to this motion.

10 It is therefore respectfully requested that Defendant be granted an extension of time to respond
11 to Plaintiff's Motion for Reversal and Remand, through and including September 22, 2023.

12
13 Dated: August 17, 2023

Respectfully submitted,

14 JASON M. FRIERSON
15 United States Attorney

16 */s/ Michael J. Mullen*
MICHAEL J. MULLEN

17 Special Assistant United States Attorney

18 **ORDER**

19 No further extensions of time will be granted absent extraordinary circumstances.
20 IT IS SO ORDERED.

21
22 
UNITED STATES MAGISTRATE JUDGE

23
24 DATED: August 18, 2023.